

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America

v.

WILLIAM COIT

)

Case No.

19-1846

*Defendant(s)***CRIMINAL COMPLAINT**

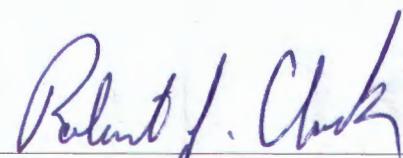
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 21, 2019 - October 24, 2019 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 922(a)(1)(A)	Unlawful dealing in firearms - one count (See Attachment A)
Title 18, United States Code, Section 922(g)(1)	Possession of a firearm by a felon - six counts (See Attachment A)
Title 21, United States Code, Section 841(a)(1)	Distribution of a controlled substance - two counts (See Attachment A)

This criminal complaint is based on these facts:

See Attached Affidavit

 Continued on the attached sheet.


 Complainant's signature

Robert Clark, FBI Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: October 31, 2019


Judge's signature

David R. Strawbridge, United States Magistrate Judge

Printed name and title

City and state: Philadelphia, Pennsylvania

ATTACHMENT A**COUNT ONE**

From on or about August 21, 2019 to on or about October 24, 2019, in Philadelphia, in the Eastern District of Pennsylvania, defendant WILLIAM COIT willfully engaged in the business of dealing in firearms without being licensed to do so under the provisions of Chapter 44, Title 18, United States Code. In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

COUNTS TWO THROUGH SEVEN

On or about each of the dates listed in the below chart, in Philadelphia, in the Eastern District of Pennsylvania, defendant WILLIAM COIT, knowing he had previously been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed each of the firearms listed in the below chart, and each of the firearms were in and affecting interstate and foreign commerce.

COUNT	DATE	FIREARM
One	August 21, 2019	an SKS, 7.62 x 39mm Norinco semi-auto rifle, with a wooden stock and black barrel, bearing serial number 93-69250
Two	August 27, 2019	a Ruger, semi-automatic handgun, model P85, bearing serial number 301-19546, loaded with 13 rounds of ammunition
Three	August 28, 2019	a Ruger, model P85, 9mm, semi-auto handgun, black in color, bearing serial number 304-08093
Four	September 17, 2019	a black in color, Standard Manufacturing Co. LLC, model DP-12, double barrel, semi-automatic shotgun, bearing serial number DP23943
Five	October 11, 2019	a Hi-Point Firearms, .40 caliber rifle, Model 4096, bearing serial number H38599
Six	October 24, 2019	a Glock, model 22, .40 caliber, semi-automatic handgun, bearing serial number CP5453, loaded with one extended magazine with 20 rounds of ammunition; and a Taurus, model PT111 G2 A, nine millimeter, semi-automatic handgun, bearing serial number TLN19827

In violation of Title 18, United States Code, Section 922(g)(1).

COUNTS EIGHT AND NINE

On or about September 17, 2019, and October 8, 2019, in Philadelphia, in the Eastern District of Pennsylvania, defendant WILLIAM COIT knowingly and intentionally distributed a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance. In violation of Title 21, United States Code, Section 841(a)(1).

**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT**

I, Robert Clark, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Task Force Officer with the Federal Bureau of Investigation (FBI) and am currently employed as a special agent with the Pennsylvania Office of the Attorney General, and have been a task force officer since March 1999. As such, I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. As part of my duties with the FBI, I investigate violations of federal criminal law over which the FBI has jurisdiction, including violent crimes, gangs, drug trafficking organizations, firearms trafficking and other violent criminal elements. Over the course of these investigations, I have conducted interviews of witnesses, victims and suspects, participated in physical and electronic surveillance, utilized pen registers and trap and trace devices, applied for and received numerous search and seizure warrants and arrest warrants. I have participated in searches authorized by consent, search warrants, and other legal grounds, for residences, businesses, cellular telephones and vehicles for the purpose of obtaining evidence. While a Task Force Officer of the FBI, I have also participated in investigations classified under the Organized Crime Drug Enforcement Task Force (OCDETF), which is a national initiative focused on targeting drug trafficking organizations and violent street gangs and criminal organizations, that have included the illegal possession, use and distribution of firearms.

2. The facts in this affidavit come from my personal observations, my training and experience, information obtained from other agents and witnesses, review of recordings and documents and other evidence developed during the investigation. This affidavit is intended to

show merely that there is probable cause for the issuance of an arrest warrant and does not set forth all of my knowledge about this matter. Any observations not made by me, were made by other law enforcement officers involved in the investigation whom I know to be reliable and trustworthy.

3. Based on the facts set forth below, your affiant submits there is probable cause to believe that WILLIAM COIT, has committed the following offenses: (1) unlawful dealing in firearms, in violation of 18 U.S.C. § 922(a)(1)(A) (2); (2) possession of a firearm by a felon, in violation of 18 U.S.C. § 922(g)(1), and (3) distribution of a controlled substance, in violation of 21 U.S.C. § 841(a).

PROBABLE CAUSE

4. In late August, Agents and Task Force Officers with FBI Philadelphia's Safe Streets Violent Gang Task Force (Squad C3) received information from an FBI confidential human source (CHS-96184) that COIT was distributing firearms, including handguns and rifles throughout Philadelphia. CHS-96184 knew COIT personally and knew him to utilize cellular telephone number 267-506-1376 and drive a grey Chrysler 300. Based on this information, members of Squad 3 initiated an investigation into COIT's illegal activities.

5. On Wednesday August 21, 2019, at approximately 5:50 p.m., members of Squad C3, to include Task Force Officer Joseph Domico, Special Agent Matthew King and your affiant met with CHS-96184 and another FBI confidential human source (CHS-92116) for the purpose of attempting to set up a controlled purchase of a firearm from COIT. Both CHSs were searched for illegal contraband, money, and weapons with negative results. CHS-92116 was provided with a consensual audio recording device, which CHS-92116 maintained throughout the operation. CHS-92116 was supplied with \$800 buy money. CHS-96184 then placed a call to 267-506-1376.

COIT answered the phone and CHS-96184 told COIT that he had a friend who was interested in purchasing a firearm. COIT told CHS-96184 that he had guns for sale and directed CHS-96184 and his friend to meet him at the Wawa convenience store in the area of Richmond Street and Allegheny Avenue (3200 block of Richmond Street, Philadelphia, Pennsylvania). CHS-96184 and CHS-92116 drove to and parked in the lot at the Wawa on Richmond and Allegheny. At approximately 6:05 p.m., a grey Chrysler 300 bearing Pennsylvania tag number KYX-9817 (driven by COIT) pulled into the Wawa parking lot and parked. CHS-96184 and CHS-92116 then got into the Chrysler. Approximately five minutes later, both CHSs got out of the Chrysler and got back into CHS-96184's vehicle. CHS-92116 was carrying a large soft canvas rifle bag when he got out of COIT's Chrysler. CHS-96184 and CHS-92116 then returned to Task Force Officer Domico and CHS-92116 handed over an SKS, 7.62 x 39mm Norinco semi-auto rifle, with a wooden stock and black barrel, bearing serial number 93-69250, along with one magazine. CHS-96184 and CHS-92116 told investigators that COIT was the only occupant in the Chrysler when they got in and that it was COIT who handed the canvas bag containing the rifle to CHS-92116.

6. On August 27, 2019, Task Force Officer Domico along with Special Agent Jeremy Beh and your affiant met with CHS-92116 who was then searched for illegal contraband, money, and weapons, with negative results. A consensual audio recording device was provided to the CHS, which was maintained by the CHS throughout the transaction. The CHS was supplied \$800 buy money and placed a call to COIT. COIT directed the CHS to the Wawa in the area of Richmond Street and Allegheny Avenue (3200 block of Richmond Street, Philadelphia, Pennsylvania). At approximately 5:40 p.m., COIT arrived in the same grey Chrysler from August 21st, pulled into the Wawa lot and parked. The CHS got into the COIT's Chrysler.

Approximately five minutes later the CHS got out of the car and walked directly back to Officer Domico. The CHS handed over a Ruger, semi-automatic handgun, model P85, bearing serial number 301-19546, loaded with one magazine with 13 rounds. The CHS told investigators that COIT was the only occupant inside the Chrysler and that COIT handed him the handgun.

7. On August 28, 2019, Task Force Officer Domico along with Special Agent Jeremy Beh and your affiant met with CHS-92116. The CHS was searched for illegal contraband, money, and weapons, with negative results. The CHS was provided with a consensual audio recording device, which was maintained by the CHS throughout the transaction. The CHS was supplied \$800 in buy money and placed a call to 267-506-1376 and had a conversation with COIT. COIT later called CHS-92116 and told him to meet at the Wawa at Richmond Street and Allegheny Avenue (3200 block of Richmond Street, Philadelphia, Pennsylvania). At approximately 6:55 p.m., COIT arrived at the Wawa driving the blue Charger. The CHS entered the Charger and remained for approximately two minutes. COIT then got out and walked into the Wawa. The CHS returned to Officer Domico and handed over a Ruger, model P85, 9mm, semi-auto handgun, black in color, bearing serial number 304-08093, with one magazine. The CHS told investigators that COIT was the only other occupant in the blue Charger and that it was COIT who handed him the handgun.

8. During the August 28, 2019 firearm sale described above, COIT told CHS-92116 they should expect to pay less, \$600, for the next gun they purchase from COIT. COIT also boasted to the CHS he had access to guns, stating, "the niggas I fuck with got guns..." COIT also stated, "I got 10 handguns and six rifles just mines." At the conclusion of their meeting COIT told the CHS, "got you on the next jawn I give you my word." The CHS responded, "I'll give

you a call whenever they ready cause I got a couple niggas," and COIT responded, "Alright." In addition, CHS asked COIT if he sold heroin. COIT responded that he does sell heroin.

9. On September 17, 2019, members of Squad C3 established physical surveillances in the areas of the 3200 block of Emery Street and the 3300 block of Rand Street, Philadelphia, Pennsylvania. Surveillance was initiated at approximately 3:30 p.m. The surveillance was established in support of a controlled heroin and firearm purchase by CHS-92116. The CHS was searched for contraband with negative results, provided with a consensual recording device, and \$1,700 in buy money.

10. At approximately 3:55 p.m., CHS-92116 received an incoming call from COIT. The CHS told COIT that they were interested in purchasing another gun. COIT told the CHS that he would call his man and see if he had any available for sale. At approximately 4:38 p.m., the CHS called COIT for an update. COIT told the CHS that his man had a gun for sale and that COIT was on his way to pick it up for the CHS. COIT told the CHS to meet him at the Wawa. At approximately 5:25 p.m. the CHS received an incoming call from 267-506-1376. COIT told the CHS that he had the firearm and would be at the Wawa shortly.

11. At 5:25 p.m., surveillance officers observed COIT's blue Charger driving southbound on the 3200 block of Emery Street. COIT parked the Charger in the Wawa parking lot located in the 3200 block of Richmond Street. COIT got out of the driver's side of the Charger and walked to and entered the residence located at 3246 Emery Street. As COIT walked to 3246 Emery he saw CHS-92116 and motioned for the CHS to get into the Charger. At 5:27 p.m., the CHS got into the passenger side of the Charger. At 5:30 p.m., COIT left 3246 Emery Street carrying a large plastic bag and a large tan sheet. COIT got into the front driver's side of the Charger, with these items. At 5:36 p.m., COIT got out of the Charger and the CHS got out of

the passenger side of the Charger and departed the area with a bulky object wrapped in the tan/brown fabric.

12. At 5:40 p.m., CHS-92116 turned over to law enforcement a black in color, Standard Manufacturing Co. LLC, model DP-12, double barrel, semi-automatic shotgun, bearing serial number DP23943 which was wrapped in a tan colored sheet. The CHS also turned over eight blue in color, glassine packets, inside of plastic sleeves, stamped “2Step,” each containing suspected fentanyl. A narcotics field test was conducted on a portion of the recovered narcotics, and was positive for the presence of fentanyl. The CHS reported that when COIT got into the Charger he had a large plastic bag which contained what COIT said was 50 bundles of heroin. COIT gave the CHS eight individual packets of suspected fentanyl from the bag as a sample. He told the CHS that the rest of the heroin was for another customer who he was meeting with after the CHS. COIT then showed the CHS the shotgun and explained how the sight worked. COIT then wrapped the gun in the tan colored sheet and handed it to the CHS.¹

13. At 5:44 p.m., the Charger stopped on the 2100 block of East Westmoreland Street and met with an unidentified Hispanic male (“HM”). COIT gave the HM a large plastic bag. The Charger left the area, while the HM walked westbound on Westmoreland Street.

14. At 5:49 p.m., surveillance units attempted to stop the HM for investigation. The HM dropped the large plastic bag and fled on foot. The HM was not stopped, but the bag was recovered and found to contain 50 bundles of fentanyl, each stamped “TwoStep,” for a total of

¹ COIT and CHS-92116 referred to the narcotics that COIT was selling as heroin, when in fact the field test revealed that they contained fentanyl. In your affiant’s experience this is common among heroin distributors in Philadelphia. The reason the term for the drugs are used interchangeably is because they have similar effects on those that use them and suppliers often do not distinguish between the two.

750 packets. A portion of the narcotics was field tested and was positive for the presence of fentanyl.

15. On September 19, 2019 at 9:19 p.m., Philadelphia Police Officers Glenn and Herrmann observed the blue 2011 Dodge Charger, bearing Pennsylvania tag number LDE-5289 being driven in the area of the 3200 block of Jasper Street in Philadelphia. This is the same Charger that COIT was observed driving on August 28, 2019 and September 17, 2019 when he sold guns to CHS-92116. The officers utilized both visual (lights) and audio (siren) signals in an attempt to stop the vehicle for investigation of illegal window tint. The vehicle briefly pulled over, but then fled at a high rate of speed as the officers approached. Prior to the vehicle fleeing, Police Officer Glenn observed that the driver was wearing a white tee shirt and had braided or pigtail styled hair.

16. Shortly thereafter, the Charger collided with another vehicle in the area of Kensington Avenue and Hart Lane (1800 block of Hart Lane) in Philadelphia. The driver fled on foot and escaped. As the male fled, Police Officer Patrick Clark, who observed the pursuit observed that the driver was a light skinned black male or Hispanic male, at least 6'0" tall, stocky build, some facial hair, and pigtail (braided) style hair, wearing a white tee shirt, dark colored jogging pants, and white sneakers.

17. After attempting to pursue the driver of the Charger, Philadelphia Police Officers secured the Charger at the scene. The officers recovered a black in color, Diamondback Firearms 5.56 caliber rifle, model DB15, bearing serial number DB1725015 from within the vehicle. The firearm was loaded with a magazine containing twenty-four live rounds of ammunition. The vehicle was seized for further investigation and transported to the Philadelphia Police lot for storage.

18. On September 20, 2019, COIT called CHS-92116 using a number that was different than the number he had previously used to contact CHS-92116 and asked if the CHS was still interested in purchasing “work” from him. In your affiant’s experience, suppliers of narcotics typically refer to illegal narcotics, including fentanyl and heroin, as “work.” The CHS confirmed that he was and COIT told the CHS he had to charge the CHS \$50 per bundle of fentanyl rather than the previously agreed upon price of \$45 per bundle. COIT explained that something happened the night before and that he suffered a loss for which he needed make up for. The CHS agreed to the increase in price. Your affiant believes that COIT was referring to the accident he had the night before and that the loss he references is the gun that the police recovered from the Charger.

19. On September 24, 2019, a Philadelphia Police Department Detective obtained a local search and seizure warrant for the blue 2011 Dodge Charger, bearing Pennsylvania tag number LDE-5289. The detective executed the search and seizure warrant and recovered four cellular telephones, various loose paperwork, and a Pennsylvania driver’s license in the name of William COIT. Phone records for COIT’s phone number (267-506-1376) obtained during this investigation revealed that the IMEI number associated with COIT’s phone number is the same IMEI that appeared stamped on one of the phones that was recovered from the Charger on September 19, 2019.

20. On October 8, 2019, at approximately 1:15 p.m., members of Squad C3 met with CHS-92116 for the purpose of attempting to make a controlled heroin and firearm purchase by from COIT. At approximately 1:26 p.m., the CHS called COIT and told him that he/she wanted to purchase 50 bundles of fentanyl and a firearm. COIT told the CHS that he had the 50 bundles but that he had to check with his man about the firearm. COIT instructed the CHS to meet him at

the Wawa at 3200 Richmond Street in Philadelphia. The CHS and his/her vehicle were searched for contraband with negative results. The CHS was provided with a consensual recording device and \$2,500 in buy money. The CHS was followed to the Wawa lot at 3200 Richmond Street, where he/she parked to wait for COIT.

21. At approximately 1:55 p.m., surveillance units observed a dark gray BMW bearing Pennsylvania tag KYJ-8582 drive onto the 3300 block of Rand Street. Records indicate this vehicle is registered to William Dennis Coit, 4149 North Franklin Street, Philadelphia, Pennsylvania 19149. The BMW parked in front of 3337 Rand Street and COIT got out of the driver's seat of the BMW. COIT entered the residence at 3337 Rand Street. At approximately 1:59 p.m., COIT left 3337 Rand Street and got back into the BMW. Surveillance units followed COIT to the 3200 block of Emery Street. At approximately 2:06 p.m., COIT pulled into the Wawa parking lot driving the BMW. COIT backed the BMW into an open parking spot next to the CHS's vehicle. COIT and the CHS got out of their vehicles and had a brief conversation. The CHS then got back into his/her vehicle and COIT walked to 3246 Emery Street. COIT went into 3246 Emery Street empty handed. Several minutes later, COIT left 3246 Emery Street carrying a black plastic bag. COIT walked back to the Wawa parking lot and got into the front passenger side of the CHS's vehicle. Approximately two minutes later, COIT got out of the CHS's car and got into the driver's seat of the BMW and pulled out of the Wawa parking lot.

22. At 2:28 p.m., CHS-92116 met Officer Domico and Special Agent King at a predetermined meet location. The CHS turned over the recording device and 50 bundles, each containing 15 individual packets, of suspected fentanyl. The CHS reported that when COIT got into his/her vehicle in the Wawa parking lot he handed the CHS a black plastic bag containing 50 bundles of alleged fentanyl in exchange for \$2,500 in buy money. The CHS asked COIT if he

had any guns and COIT responded that his supplier was at work until 3:00 p.m. but that when he (gun supplier) finished he (COIT) would contact him and try to get the CHS a gun. COIT told the CHS to call him in an hour. At approximately 4:09 p.m., CHS-92116 called COIT about the gun, however, COIT told CHS-92116 he was not able to get one.

23. On October 10, 2019, COIT sent a text message to CHS-92116 saying he had a gun for the CHS. COIT then sent CHS-92116 a picture of an assault style weapon. The CHS and COIT agreed to meet the next day to complete the transaction for the gun.

24. On October 11, 2019, at approximately 11:02 a.m., CHS-92116 called COIT and told him that he/she wanted to buy the gun they had discussed the night before. COIT told the CHS that he would check with his man to make sure he hadn't already sold the gun. Several minutes later, COIT called the CHS back and told him/her that the gun was still available for \$1,600. CHS-92116 agreed to the purchase price and the two agreed to meet in the area of the intersection of Lawrence Street and Cambria Street in Philadelphia. At approximately 11:36 a.m., surveillance units observed COIT pull up behind the CHS on Lawrence Street. COIT and the CHS both pulled off the block and the CHS followed COIT to the intersection of 4th Street and Cambria Street. Both vehicles parked and the CHS got out of his vehicle and got into the front passenger seat of COIT's GMC Yukon.

25. At approximately 11:41 a.m., CHS-92116 got out of the GMC Yukon carrying a large red shopping bag. At approximately 11:49 a.m., the CHS met Officer Domico, Agent King and Agent Ilardi at a predetermined meet location. The CHS turned over the recording device and a Hi-Point Firearms, .40 caliber rifle, Model 4096, bearing serial number H38599. The CHS reported that when he/she got into the Yukon, COIT reached into the back seat and grabbed the Hi-Point rifle. COIT showed the CHS how to operate the gun and then placed it into the red

shopping bag. COIT told the CHS that his man was getting a shipment of handguns soon and asked if the CHS was interested in buying any. The CHS responded that he/she was interested and told COIT to call when the guns were available.

26. On October 24, 2019, CHS-92116 made a recorded call to COIT in the presence of Officer Domico. Special Agent Ryan Jones arrived and joined Officer Domico in the meeting with the CHS. This affiant established surveillance of the residence located at 3246 Emery Street, Philadelphia, Pennsylvania. The CHS was searched for illegal contraband, money, and weapons, with negative results. A consensual audio recording device was provided to the CHS, which was maintained by the CHS throughout the transaction. The CHS was supplied \$2,300 to buy money and placed a call to COIT. COIT directed the CHS to the Wawa in the area of Richmond Street and Allegheny Avenue (3200 block of Richmond Street, Philadelphia, Pennsylvania). At approximately 12:09 p.m., COIT was observed leaving the residence located at 3246 Emery Street, while carrying a large gray plastic bag which held something in a rectangular shape, in his right hand. COIT walked to the intersection of Emery Street and Madison Street, Philadelphia, Pennsylvania and met with the CHS. The CHS and COIT walked together to a white Chevy Equinox. COIT got into the driver's side and CHS got into the passenger seat. They remained inside of the vehicle for a few minutes. They got out of the vehicle together. The CHS was carrying the large gray plastic bag, while COIT left with nothing in his hands. COIT and the CHS walked together to the intersection of Emery Street and Madison Street, Philadelphia, Pennsylvania, then separated. The CHS walked directly back to Officer Domico and Special Agent Jones. The CHS handed over the large plastic bag to Special Agent Jones. The bag contained an orange and white "Nike" box. Inside of the "Nike" box was a Glock, model 22, .40 caliber, semi-automatic handgun, bearing serial number CP5453, loaded

with one extended magazine with 20 rounds and a Taurus, model PT111 G2 A, nine millimeter, semi-automatic handgun, bearing serial number TLN19827, with one unloaded magazine. The CHS related that COIT was offering to sell an AR-15 and another long gun to the CHS.

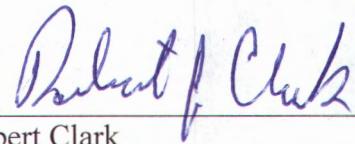
27. An examination of all aforementioned firearms was conducted to determine their origin. None of the firearms recovered in this investigation were produced or manufactured in Pennsylvania. Therefore, each firearm traveled in interstate commerce prior to being possessed by COIT and subsequently recovered by investigators. Also, each of the seized firearms meets the definition of firearm as set forth in 18 U.S.C. § 921(a)(3).

28. Through my investigation, I am aware that COIT is not a licensed firearms dealer under the provisions of Chapter 44, Title 18, United States Code. I am also aware that COIT is a convicted felon, that is, he has been convicted of a crime punishable by more than one year imprisonment, and is therefore prohibited from possessing firearms. A search of the Pennsylvania criminal history database revealed that COIT has the following history of felony convictions:

2008, PWID - Sentenced to 11 ½ to 23 plus probation
2008, PWID - Sentenced to 11 ½ to 23 plus probation
2008, PWID - Sentenced to 11 ½ to 23 plus probation
2010, Escape - Sentenced to 11 ½ to 23 plus probation
2011, Escape - Sentenced to 11 ½ to 23 plus probation
2014, VUFA - Sentenced to 11 ½ to 23 plus probation
2014, Possession of contraband - Sentenced to 11 ½ to 23 plus probation
2013, Receiving Stolen Property - Sentenced to 11 ½ to 23 plus probation

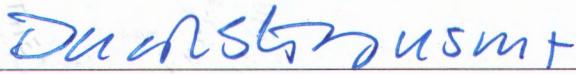
29. Based upon the facts set forth in this affidavit, your affiant submits that there is probable cause to believe that COIT has engaged in the illegal possession and sale of firearms, and distribution of narcotics in violation of 18 U.S.C. §§ 922(a)(1)(A) and 922(g)(1), and 21

U.S.C. §§ 841(a). Therefore, I request that a warrant be issued for his arrest.



Robert Clark
Special Agent
Federal Bureau of Investigation

Sworn and subscribed before
me this 31st day of October, 2019,
at Philadelphia, Pennsylvania



HONORABLE DAVID R. STRAWBRIDGE
United States Magistrate Judge

ATTACHMENT A**COUNT ONE**

From on or about August 21, 2019 to on or about October 24, 2019, in Philadelphia, in the Eastern District of Pennsylvania, defendant WILLIAM COIT willfully engaged in the business of dealing in firearms without being licensed to do so under the provisions of Chapter 44, Title 18, United States Code. In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

COUNTS TWO THROUGH SEVEN

On or about each of the dates listed in the below chart, in Philadelphia, in the Eastern District of Pennsylvania, defendant WILLIAM COIT, knowing he had previously been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed each of the firearms listed in the below chart, and each of the firearms were in and affecting interstate and foreign commerce.

COUNT	DATE	FIREARM
One	August 21, 2019	an SKS, 7.62 x 39mm Norinco semi-auto rifle, with a wooden stock and black barrel, bearing serial number 93-69250
Two	August 27, 2019	a Ruger, semi-automatic handgun, model P85, bearing serial number 301-19546, loaded with 13 rounds of ammunition
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In violation of Title 18, United States Code, Section 922(g)(1).

COUNTS EIGHT AND NINE

On or about September 17, 2019, and October 8, 2019, in Philadelphia, in the Eastern District of Pennsylvania, defendant WILLIAM COIT knowingly and intentionally distributed a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance. In violation of Title 21, United States Code, Section 841(a)(1).